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 5 Attorneys for Plaintiffs
 CHARLES O. BRADLEY TRUST,
 6 LINDA L. BRADLEY TRUST,
 KEN & SHARON BURGE TRUST,
 7 BRAD MARTIN BURGE,
 SCOTT & NOA L. DYKSTRA,
 8 RONALD C. HALL, RENTAL
 CENTER PROPERTIES, a California Partnership,
 9

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA
 12

13 CHARLES O. BRADLEY TRUST, et al,
 14 Plaintiffs,
 15 vs.
 16 ZENITH CAPITAL LLC; et al,
 17 Defendants.
 18

Case No.: C 04 2239 JSW (EMC)

**STIPULATION FOR DISMISSAL
 OF DEFENDANT KENNETH
 WIDDER**

19 Plaintiffs CHARLES O. BRADLEY TRUST, LINDA L. BRADLEY TRUST, KEN
 20 & SHARON BURGE TRUST, BRAD MARTIN BURGE, SCOTT & NOA L. DYKSTRA,
 21 RONALD C. HALL, RENTAL CENTER PROPERTIES, a California Partnership
 22 ("Plaintiffs"), and defendant KENNETH WIDDER ("Widder"), through their attorneys of
 23 record, agree and stipulate that an order dismissing Widder may be entered on the following
 24 terms and conditions:

25 1. Dismissal without Prejudice. A dismissal without prejudice of each and every cause
 26 of action by plaintiffs may be entered in favor of Widder.

27 2. Tolling of Applicable Statutes of Limitations. Any and all statutes of limitations
 28 applicable to the commencement of litigation against Widder by plaintiffs based on claims

arising out of Widder's membership in LF Global Investments, LLC a California Limited Liability Company, whether resulting from negligence or otherwise, are tolled from the date of filing of the order approving this dismissal.

3. Dismissal with Prejudice. The dismissal approved by the court pursuant to paragraph 1 above shall automatically become a dismissal with prejudice upon the happening of the earlier of either:

A. A final judgment as to each and every cause of action by plaintiffs is entered in this action, or;

B. Widder executes and complies with a settlement agreement with the court appointed receiver that is both approved by the court in that certain action entitled Securities and Exchange Commission v. Global Money Management, L.P., LF Global Investments, LLC, and Marvin I. Friedman, Case No. 04CV00521 BTM (WMC) ("the SEC action") in the United States District Court, Southern District of California, which substantially conforms to the material (but not necessarily procedural) terms contained in the document entitled "Settlement Agreement with Receiver" provided to plaintiffs by Widder in a letter from Widder dated July 1, 2005 with the following exception: Paragraph "M" shall be modified to read as follows: "In January, 2001 WCV received an investment of \$2,000,000 which it recorded as an investment by Zenith Investors One LLC. The Receiver, on behalf of GMM and LF Global, asserts that this investment is the property of the Receiver as the funds were the funds of GMM/LF, the investment was made by LF Global, and the Receiver claims that Zenith Investors One LLC has no interest in WCV and claims that the funds came from LF Global and the investment was made by LF Global.";

C. A final judgment as to each and every cause of action is entered in the SEC action.

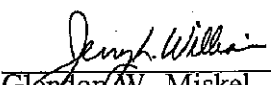
4. Nothing herein prohibits a challenge by plaintiffs in a forum they may deem appropriate to any distribution of assets made by Windamere and Widder shall give plaintiffs sufficient notice prior to any such distribution.

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1 SO STIPULATED.


2 JOHNSON & MISKEL

3
4 Dated: August 15, 2005


Glendon W. Miskel
Gerald L. Williams
Attorneys for Plaintiffs

7 SULLIVAN, HILL, LEWIN, REZ & ENGEL

8
9 Dated: August 5, 2005


Donald G. Rez, Esq.
Attorneys for Defendant Kenneth Widder

11 IT IS SO ORDERED

12
13 DATED: August 15, 2005


UNITED STATES DISTRICT JUDGE

JOHNSON & MISKEL
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